



November 22, 1999

57 '99 NOV 23 AM 44

Dockets Management Branch (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, MD 20852

RE: For Inclusion in your Docket #91N-0 103

To Whom It May Concern:

It seems unlikely that the FDA would miss important papers in the medical literature-but there are four 1999 papers about two large studies that clearly document cardiovascular health benefits of balancing the essential fatty acids in foods (increasing omega-3 and decreasing omega-6). They are:

1. The Final Report of the Lyon Diet Heart Study by Michael deLogeril et al, Circulation 99: 779-785, 1999
2. An Editorial on the Lyon Diet Heart Study by A. Leaf, Circulation 99: 733735, 1999
3. The results of the GISSI-Prevenzione trial by the large group of investigators in Lancet **354: 447-455**, 1999
4. An editorial comment on the GISSI results by Morris Brown in Lancet 354: 441-442, 1999

The results in these reports provide clear support for the claim of cardiovascular benefits of including omega-3 fats in the daily diet and encourage reversal of the earlier FDA denial of the claim.

In addition, results from the US Physicians Health Study reported that consumption of fish at least once per week may reduce the risk of sudden cardiac death in men (CM Albert et al, J.Am.Med. Assoc. 279:23-28, 1998), and it was discussed by NF Sheard in Nutrition Reviews 56: 177-179, 1998.

In 1999, the many reports of omega-3 fats diminishing high blood pressure in animals were extended to humans by TA Mori et al, in Hypertension 34: 253-260, 1999, who demonstrated reduction of ambulatory blood pressure and heart rate.

91N-0103

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Internet: www.flax.com

Production Plant:
5703 CTH U, Newton, WI 53063
Phone: 920-726-4221 or 888-353-FLAX
Fax: 920-726-4224
E-mail: enreco@lakefield.net

A similar conclusion was produced from an expert workshop held at the NIH in Bethesda in April 1999 and from a separate expert workshop convened at the University of Maryland in Baltimore in June, 1999.

I think that the power of these recent studies plus all of the work done since 1973 by Dr. William Lands, Senior Scientific Advisor, NIAAA, proves beyond a shadow of a doubt that Omega-3 is beneficial for preventing and treating heart disease, especially when it comes to weighing the low effectiveness of drug treatments and considerable side-effects. Besides, a mountain of evidence shows other beneficial effects of Omega-3 on mental health, immune system, bone metabolism, and the functioning of the retina. For references for these statements, you may check over 2500 references available at www.flax.com.

Sincerely,

Paul A. Still

PAS:bmh

Enclosures: As listed above
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Citations 1 to 20 of 61 from MEDLINE

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Related Articles	CIT. IDS:	PMID: 10192911 UI: 99208991
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r	TITLE:	Effects of docosahexaenoic and eicosapentaenoic acid on lipid metabolism, eicosanoid production, platelet aggregation and atherosclerosis in hypercholesterolemic rats.
Full Citation	AUTHORS:	Adan Y, et al.
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Related Articles	CIT. IDS:	PMID: 10030453 UI: 99153524
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Full Citation	AUTHORS:	Hirafuji M, et al.
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Related Articles	CIT. IDS:	PMID: 9920344 UI: 99117072
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Full Citation	AUTHORS:	Prisco D, et al.
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Related Articles	CIT. IDS:	PMID: 9733153 UI: 98401989
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Full Citation	AUTHORS:	Kimura S, et al.
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Related Articles	CIT. IDS:	PMID: 9730013 UI: 98397742

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[Full Citation](#) **AUTHORS:** Wright T, et al.
SOURCE: World Rev Nutr Diet. 1998;83: 160-5. Review. No abstract available.
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[Full Citation](#) **AUTHORS:** Kimura S, et al.
SOURCE: Res Commun Mol Pathol Pharmacol. 1998 Apr;100(1):53-64.
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R **TITLE:** Intraamniotic ethyl docosahexaenoate administration protects fetal rat brain from ischemic stress.
[Full Citation](#) **AUTHORS:** Glozman S, et al.
SOURCE: J Neurochem. 1998 Jun;70(6):2484-91.
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[Full Citation](#) **AUTHORS:** Nieuwenhuys CM, et al.
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SOURCE: Mol Cell Biochem. 1998 Jan;178(1-2):353-66.
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[Related Articles](#) **CIT. IDS:** PMID: 9507989 UI: 98167407

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[Full Citation](#)

AUTHORS: Hirafuji M, et al.

SOURCE: Nippon Yakurigaku Zasshi. 1997 Oct; 110 Suppl 1: 171P-176P. Japanese.

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AUTHORS: Minami M, et al.

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AUTHORS: Crawford MA, et al.

SOURCE: Am J Clin Nutr. 1997 Oct;66(4 Suppl):1032S-1041S. Review.

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[Full Citation](#)**AUTHORS:** Singh RR, et al.**SOURCE:** Cardiovasc Drugs Ther. 1997 Jul;11(3):485-91.[Related Articles](#)**CIT. IDS:** PMID: 9310278 UI: 97454203

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[Full Citation](#)**AUTHORS:** Minami M, et al.**SOURCE:** Gen Pharmacol. 1997 Sep;29(3):401-7.[Related Articles](#)**CIT. IDS:** PMID: 9378247 UI: 98020726

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[Full Citation](#)**AUTHORS:** Murakami T, et al.**SOURCE:** J Nutr Sci Vitaminol (Tokyo). 1997 Apr;43(2):211-23.[Related Articles](#)**CIT. IDS:** PMID: 9219094 UI: 97362630

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[Full Citation](#)**AUTHORS:** Panchenko VM, et al.**SOURCE:** Klin Med (Mosk). 1997;75(3):39-41. Russian. No abstract available.[Related Articles](#)**CIT. IDS:** PMID: 9229613 UI: 97314590

r **TITLE:** Supplementation with an algae source of docosahexaenoic acid increases (n-3) fatty acid status and alters selected risk factors for heart disease in vegetarian subjects.

[Full Citation](#)**AUTHORS:** Conquer JA, et al.**SOURCE:** J Nutr. 1996 Dec;126(12):3032-9.[Related Articles](#)**CIT. IDS:** PMID: 9001371 UI: 97154653**R****TITLE:**

The effects of omega-3 polyunsaturated (correction of polyunsaturated) fatty acids on the recovery of cardiac function following cold preservation and reperfusion in hyperlipidemic rats.

[Full Citation](#)**AUTHORS:** Ku K, et al.**SOURCE:** Transplantation. 1996 Sep 27;62(6):735-42.[Related Articles](#)**CIT. IDS:** PMID: 8824469 UI: 96421852**R****TITLE:**

Effects of eicosapentaenoic acid and docosahexaenoic acid diet supplement on tolerance to the cardiotoxicity of epirubicin and to ischaemia reperfusion in the isolated rat heart.

[Full Citation](#)**AUTHORS:** Schjott J, et al.**SOURCE:** Pharmacol Toxicol. 1996 Aug;79(2):65-72.[Related Articles](#)**CIT. IDS:** PMID: 8878248 UI: 97032352**R****TITLE:**

Exposure to the n-3 polyunsaturated fatty acid docosahexaenoic acid impairs alpha 1-adrenoceptor-mediated contractile responses and inositol phosphate formation in rat cardiomyocytes.

[Full Citation](#)**AUTHORS:** Reithmann C, et al.**SOURCE:** Naunyn Schmiedebergs Arch Pharmacol. 1996 Jul;354(2):109-19.[Related Articles](#)**CIT. IDS:** PMID: 8857587 UI: 97010549**R****TITLE:**

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Effect of fish oil on heart rate variability in survivors of myocardial infarction: a double blind randomised controlled trial.

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r TITLE: [Effect of docanol on the status of hemostasis and fibrinolysis systems, as well as lipid spectrum in patients with ischemic heart disease depending on the initial level of fibrinolytic activity].

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[Full Citation](#) AUTHORS: Kimura S, et al.

SOURCE: Clin Exp Pharmacol Physiol. 1995 Dec;22 Suppl 1:S308-9.

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[Full Citation](#) AUTHORS: Umemura K, et al.

SOURCE: Thromb Res. 1995 Jun 1;78(5):379-87.

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[Full Citation](#) AUTHORS: Kimura S, et al.

SOURCE: Clin Exp Pharmacol Physiol Suppl. 1995;1:S308-9.

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r **TITLE:** Increased proportion of docosahexanoic acid and high lipid peroxidation capacity in erythrocytes of stroke patients.

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AUTHORS: Imre SG, et al.

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r **TITLE:** The omega-3 fatty acid docosahexaenoate reduces cytokine-induced expression of proatherogenic and proinflammatory proteins in human endothelial cells.

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AUTHORS: De Caterina R, et al.

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r **TITLE:** The effects of n-3 fatty acid supplementation on bleeding time, plasma fatty acid composition, and in vitro platelet aggregation in cats.

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AUTHORS: Bright JM, et al.

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AUTHORS: Billman GE, et al.

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[Full Citation](#)**AUTHORS:** Schmitt Y, et al.**SOURCE:** Z Ernahrungswiss. 1993 Sep;32(3):209-18. German.[Related Articles](#)**CIT. IDS:** PMID: 8237080 UI: 94055361

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[Full Citation](#)**AUTHORS:** Yasugi T, et al.**SOURCE:** Ann N Y Acad Sci. 1993 Mar 15;676:70-82. No abstract available.[Related Articles](#)**CIT. IDS:** PMID: 8489157 UI: 93256436

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[Full Citation](#)**AUTHORS:** Landmark K, et al.

SOURCE: J Hum Hypertens. 1993 Feb;7(1):25-32.

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AUTHORS: Bellamy CM, et al.

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CIT. IDS: PMID: 1289091 UI: 93170335

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AUTHORS: Du Plooy WJ, et al.

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TITLE: Effects of a combination of evening primrose oil (gamma linolenic acid) and fish oil (eicosapentaenoic + docosahexaenoic acid) versus magnesium, and versus placebo in preventing pre-eclampsia.

[Full Citation](#)

AUTHORS: D'Almeida A, et al.

SOURCE: Women Health. 1992;19(2-3):117-31.

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CIT. IDS: PMID: 1492408 UI: 93150614

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AUTHORS: Spannagl M, et al.

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AUTHORS: Nikkila M

SOURCE: Eur J Clin Nutr. 1991 Apr;45(4):209-13.

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TITLE: Suppression of atherogenesis by n-3 fatty acids in the cholesterol-fed rabbit.

[Full Citation](#)**AUTHORS:** Demirogiu C, et al.**SOURCE:** Angiology. 1991 Apr;42(4):323-30.[Related Articles](#)**CIT. IDS:** PMID: 1826589 UI: 91196933**r****TITLE:** [The role of n-3 polyunsaturated fatty acid on coronary heart disease].[Full Citation](#)**AUTHORS:** Lu G**SOURCE:** Chung Hua Hsin Hsueh Kuan Ping Tsa Chih. 1990 Oct;18 (5):279-81. Chinese. No abstract available.[Related Articles](#)**CIT. IDS:** PMID: 2150806 UI: 91199916**r****TITLE:** Effect of eicosapentaenoic and docosahexaenoic acids on blood pressure in hypertension. A population-based intervention trial from the Tromso study.[Full Citation](#)**AUTHORS:** Bonna KH, et al.**SOURCE:** N Engl J Med. 1990 Mar 22;322(12):795-801.[Related Articles](#)**CIT. IDS:** PMID: 2137901 UI: 90174237**r****TITLE:** Fish oil: a panacea?[Full Citation](#)**AUTHORS:** Bilo HJ, et al.**SOURCE:** Biomed Pharmacother. 1990;44(3):169-74. Review.[Related Articles](#)**CIT. IDS:** PMID: 2144459 UI: 90373932**r****TITLE:** Effect of fish oil on blood pressure and serum lipids in hypertension and hyperlipidaemia.[Full Citation](#)**AUTHORS:** Steiner A, et al.**SOURCE:** J Hypertens Suppl. 1989 May;7(3):S73-6.[Related Articles](#)**CIT. IDS:** PMID: 2547916 UI: 89341958**r****TITLE:** Fish-oil dietary supplementation in patients with Raynaud's phenomenon: a double-blind, controlled, prospective study.[Full Citation](#)**AUTHORS:** DiGiacomo RA, et al.**SOURCE:** Am J Med. 1989 Feb;86(2):158-64.[Related Articles](#)**CIT. IDS:** PMID: 2536517 UI: 89116243**r****TITLE:** Short-term effects of omega-3 fatty acids on exercise stress test parameters, angina and lipoproteins.[Full Citation](#)**AUTHORS:** Vacek JL, et al.

SOURCE: Biomed Pharmacother. 1989;43(5):375-9. Review.

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TITLE: Eskimo plasma constituents, dihomogamma-linolenic acid, eicosapentaenoic acid and docosahexaenoic acid inhibit the release of atherogenic mitogens.

[Full Citation](#)

AUTHORS: Smith DL, et al.

SOURCE: Lipids. 1989 Jan;24(1):70-5.

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TITLE: Eicosapentaenoic acid and adult diseases in Japan: epidemiological and clinical aspects.

[Full Citation](#)

AUTHORS: Hirai A, et al.

SOURCE: J Intern Med Suppl. 1989;225(731):69-75.

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CIT. IDS: PMID: 2539836 UI: 89207014

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TITLE: n-3 fatty acids as precursors for active metabolic substances: dissonance between expected and observed events.

[Full Citation](#)

AUTHORS: Lands WE

SOURCE: J Intern Med Suppl. 1989;225(731):11-20. Review.

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TITLE: Fish consumption and risk of sudden cardiac death [see comments]

AUTHORS: Albert CM; Hennekens CH; O'Donnell CJ; Ajani UA; Carey VJ; Willett WC; Ruskin JN; Manson JE

AUTHOR AFFILIATION: Department of Medicine, Brigham and Women's Hospital, Boston, MA 02215- 1204, USA.

SOURCE: JAMA 1998 Jan 7;279(1):23-8

CITATION IDS: PMID: 9424039 UI: 98084655

COMMENT: Comment in: JAMA 1998 Jan 7;279(1):65-6

ABSTRACT: **CONTEXT:** Dietary fish intake has been associated with a reduced risk of fatal cardiac end points, but not with nonfatal end points. Dietary fish intake may have a selective benefit on fatal arrhythmias and therefore sudden cardiac death. **OBJECTIVE:** To investigate prospectively the association between fish consumption and the risk of sudden cardiac death. **DESIGN:** Prospective cohort study. **SETTING:** The US Physicians' Health Study. **PATIENTS:** A total of 20 551 US male physicians 40 to 84 years of age and free of myocardial infarction, cerebrovascular disease, and cancer at baseline who completed an abbreviated, semiquantitative food frequency questionnaire on fish consumption and were then followed up to 11 years. **MAIN OUTCOME MEASURE:** Incidence of sudden cardiac death (death within 1 hour of symptom onset) as ascertained by hospital records and reports of next of kin. **RESULTS:** There were 133 sudden deaths over the course of the study. After controlling for age, randomized aspirin and beta carotene assignment, and coronary risk factors, dietary fish intake was associated with a reduced risk of sudden death, with an apparent threshold effect at a consumption level of 1 fish meal per week (P for trend=.03). For men who consumed fish at least once per week, the multivariate relative risk of sudden death was 0.48 (95% confidence interval, 0.24-0.96; P=.04) compared with men who consumed fish less than monthly. Estimated dietary n-3 fatty acid intake from seafood also was associated with a reduced risk of sudden death but without a significant trend across increasing categories of intake. Neither dietary fish consumption nor n- 3 fatty acid intake was associated with a reduced risk of total myocardial infarction, nonsudden cardiac death, or total cardiovascular mortality. However, fish consumption was associated with a significantly reduced risk of

total mortality. **CONCLUSION:** These prospective data suggest that consumption of fish at least once per week may reduce the risk of sudden cardiac death in men.

MAIN MESH HEADINGS: Death, Sudden, Cardiac/*epidemiology
*Seafood

ADDITIONAL MESH HEADINGS: Adult
Aged
Aged, SO and over
Cohort Studies
Diet
Fatty Acids, Omega-3
Health Surveys
Human
Incidence
Male
Middle Age
Multivariate Analysis
Proportional Hazards Models
Prospective Studies
Risk
Support, U.S. Gov't, P.H.S.
United States/epidemiology

PUBLICATION TYPES: JOURNAL ARTICLE

CAS REGISTRY NUMBERS: 0 (Fatty Acids, Omega-3)

LANGUAGES: Eng

GRANT/CONTRACT ID: CA-34944/CA/NCI
CA-40360/CA/NCI
HL-26490/HL/NHLBI
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TITLE: Fish consumption and the 30-year risk of fatal myocardial infarction
[see comments]

AUTHORS: Daviglus ML; Stamler J; Orencia AJ; Dyer AR; Liu K; Greenland P; Walsh MK; Morris D; Shekelle RB

AUTHOR AFFILIATION: Department of Preventive Medicine, Northwestern University Medical School, Chicago, IL 60611, USA.

SOURCE: N Engl J Med 1997 Apr 10;336(15):1046-53

CITATION IDS: PMID: 9091800 UI: 97224090

COMMENT: Comment in: N Engl J Med 1997 Aug 14;337(7):497-8; discussion 498-9

Comment in: N Engl J Med 1997 Aug 14;337(7):498; discussion 498-9

Comment in: N Engl J Med 1997 Aug 14;337(7):498-9

Comment in: ACP J Club 1997 Nov-Dec;127(3):80

ABSTRACT:

BACKGROUND: Epidemiologic data on the possible benefit of eating fish to reduce the risk of coronary heart disease have been inconsistent. We used data from the Chicago Western Electric Study to examine the relation between base-line fish consumption and the 30-year risk of death from coronary heart disease. **METHODS:** The study participants were 1822 men who were 40 to 55 years old and free of cardiovascular disease at base line. Fish consumption, as determined from a detailed dietary history, was stratified (0, 1 to 17, 18 to 34, and ≥ 35 g per day). Mortality from coronary heart disease, ascertained from death certificates, was classified as death from myocardial infarction (sudden or nonsudden) or death from other coronary causes. **RESULTS:** During 47,153 person-years of follow-up, there were 430 deaths from coronary heart disease; 293 were due to myocardial infarctions (196 were sudden, 94 were nonsudden, and 3 were not classifiable). Cox proportional-hazards regression showed that for men who consumed 35 g or more of fish daily as compared with those who consumed none, the relative risks of death from coronary heart disease and from sudden or nonsudden myocardial infarction were 0.62 (95 percent confidence interval, 0.40 to 0.94) and 0.56 (95 percent confidence interval, 0.33 to 0.93), respectively, with a graded relation between the relative risks and the strata of fish consumption (P for trend = 0.04 and 0.02, respectively). These findings were accounted for by the relation of fish consumption to nonsudden death from myocardial infarction (relative risk, 0.33; 95 percent confidence interval, 0.12 to 0.91; P for trend = 0.007). **CONCLUSIONS:** These data show an inverse association between fish consumption and death from coronary heart disease, especially nonsudden death from myocardial infarction.

MAIN MESH HEADINGS:

Coronary Disease/*mortality
 *Diet
 *Fishes
 *Meat
 Myocardial Infarction/*mortality

ADDITIONAL MESH HEADINGS:

Adult
 Animal
 Coronary Disease/prevention & control
 Death, Sudden, Cardiac/epidemiology
 Follow-Up Studies
 Human
 Male
 Middle Age
 Multivariate Analysis
 Myocardial Infarction/prevention & control
 Proportional Hazards Models
 Risk
 Support, Non-U.S. Gov't
 Support, U.S. Gov't, P.H.S.

PUBLICATION TYPES:

JOURNAL ARTICLE

LANGUAGES: Eng
 GRANT/CONTRACT ID: HL 03387/HL/NHLBI
 HL 15174/HL/NHLBI
 HL 21010/HL/NHLBI



Related Articles

TITLE: Fish consumption and cardiovascular disease in the physicians' health study: a prospective study.

AUTHORS: Morris MC; Manson JE; Rosner B; Buring JE; Willett WC; Hennekens CH

AUTHOR AFFILIATION: Department of Epidemiology, Harvard School of Public Health, Boston, MA, USA.

SOURCE: Am J Epidemiol 1995 Jul 15;142(2):166-75

CITATION IDS: PMID: 7598116 UI: 95321324

ABSTRACT: The authors examined the association between dietary intake of fish and omega 3 fatty acids from seafood and the risk of cardiovascular disease in a prospective cohort study of 21,185 US male physicians who are participants in the Physicians' Health Study. In 4 years of follow-up, there were 281 incident cases of total (fatal and nonfatal) myocardial infarction, 173 cases of stroke, and 121 cardiovascular deaths. There was no evidence for association between dietary intake of fish and any cardiovascular endpoint, including myocardial infarction, stroke, and cardiovascular death. The relative risks of total myocardial infarction, adjusted for age and randomized treatment assignment, for categories of fish intake were: 1.0 for < 1 meal/week (referent), 1.6 (95% confidence interval (CI) 1.1-2.3) for 1 fish meal/week; 1.4 (95% CI 1.0-2.0) for 2-4 fish meals/week; and 1.2 (95% CI 0.6-2.2) for > or = 5 fish meals/week; chi 2 for trend = 0.9, p = 0.34. The relative risks were similar for omega 3 fatty acid intake and for specific types of fish, and did not change after adjustment for history of hypertension, hypercholesterolemia, diabetes mellitus, or angina pectoris, parental history of myocardial infarction before age 60 years, obesity, exercise, smoking, alcohol use, saturated fat intake, and vitamin supplement use. These data do not support the hypothesis that moderate fish consumption lowers the risk of cardiovascular disease.

MAIN MESH HEADINGS: Cardiovascular Diseases/*epidemiology
 *Diet
 *Fatty Acids, Omega-3
 *Seafood

ADDITIONAL MESH HEADINGS: Aged
 Cerebrovascular Disorders/epidemiology
 Follow-Up Studies
 Health Surveys
 Human
 Male
 Middle Age
 Multivariate Analysis

Myocardial Infarction/epidemiology
 Proportional Hazards Models
 Prospective Studies
 Risk Factors
 Support, U.S. Gov't, P.H.S.

PUBLICATION TYPES: JOURNAL ARTICLE
CAS REGISTRY NUMBERS: 0 (Fatty Acids, Omega-3)
LANGUAGES: Eng
GRANT/CONTRACT ID: HL-26490/HL/NHLBI
 HL-34595/HL/NHLBI
 CA-34944/CA/NCI
 +



Related Articles

TITLE: Fish consumption and sudden cardiac death [editorial; comment]
AUTHORS: Kromhout D
SOURCE: JAMA 1998 Jan 7;279(1):65-6
CITATION IDS: PMID: 9424048 UI: 98084664
COMMENT: Comment on: JAMA 1998 Jan 7;279(1):23-8
MAIN MESH HEADINGS: Death, Sudden, Cardiac/*epidemiology
 *Seafood
ADDITIONAL MESH HEADINGS: Diet
 Human
 Risk
PUBLICATION TYPES: COMMENT
 EDITORIAL
LANGUAGES: Eng



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